

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	CRIMINAL NO. 15-4268 JB
)	
vs.)	
)	
)	
ANGEL DELEON, et al,)	
)	
Defendants.)	

JOINT PROPOSED STATEMENT OF THE CASE

This is a criminal case brought by the United States government. I will sometimes refer to the United States as the prosecution. The charges against the defendants are contained in the Second Superseding Indictment. I will sometimes refer to the Second Superseding Indictment as the Indictment. There are five defendants who are charged in this matter, and all five are charged with a crime which is a type of racketeering charge. Specifically, the United States alleges that the defendants were members or associates of a racketeering enterprise known as the Sindicato Nuevo Mexico, or SNM. The five defendants are all presumed innocent.

Assistant United States Attorneys Maria Y. Armijo, Randy M. Castellano, and Matthew M. Beck will be prosecuting this case and representing the United States of America. The defendants are Daniel Sanchez, represented by Amy Jacks and Richard Jewkes; Anthony Ray Baca, represented by Marc M. Lowry and Theresa M. Duncan; Christopher Garcia, represented by Amy Sirignano and Christopher Adams; Carlos Herrera, represented by William R. Maynard and Carey Corlew Bhalla; and Rudy Perez, represented by Justine Fox-Young and Ryan J. Villa.

The defendants are charged as follows: Defendants Daniel Sanchez, Anthony Ray Baca, Carlos Herrera, and Rudy Perez have been charged in the Indictment in Count 6 with violent

crimes in aid of racketeering for conspiring to murder (J.M.) Javier Molina. These defendants have also been charged in the Indictment in Count 7 with violent crimes in aid of racketeering for the murder of (J.M) Javier Molina.

Defendant Anthony Ray Baca has been charged in the Indictment in Count 8 with violent crimes in aid of racketeering for conspiring to commit assault resulting in serious bodily injury to (J.R.) Julian Romero.

Defendant Anthony Ray Baca has been charged in the Indictment in Count 9 with violent crimes in aid of racketeering for conspiring to murder (D.S.) Dwayne Santistevan.

Defendants Anthony Ray Baca and Christopher Garcia have been charged in the Indictment in Count 10 with violent crimes in aid of racketeering for conspiring to murder (G.M.) Gregg Marcantel.

Defendant Christopher Garcia has been charged in the Indictment in Count 11 with being a felon in possession of a firearm. Defendant Christopher Garcia has also been charged in Count 12 with using or carrying a firearm during and in relation to a crime of violence.

All Defendants have pleaded not guilty to all of the respective charges and are presumed innocent.

Respectfully submitted,

JAMES D. TIERNEY
Acting United States Attorney

Electronically filed on 1/11/2018

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Approved:

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Amy Sirignano
Counsel for Christopher Garcia

Carey Bhalla
Counsel for Carlos Herrera

I HEREBY CERTIFY that I electronically
filed the foregoing with the Clerk of the
Court using the CM/ECF system which
will send electronic notification to defense
counsel of record on this date.

/s/
RANDY M. CASTELLANO
Assistant United States Attorney